BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268–0001

MAILING ONLINE SERVICE

Docket No. MC98–1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS STIREWALT TO INTERROGATORIES OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS–T3—50–60)

The United States Postal Service hereby provides the responses of witness

Stirewalt to the following interrogatories of the Office of the Consumer Advocate:

OCA/USPS–T3—50–60, filed on October 5, 1998.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,
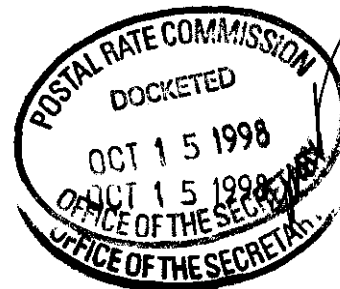
UNITED STATES POSTAL SERVICE

By its attorneys:

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October 15, 1998

OCA/USPS-T3-50. Please refer to the column "YR 1999 Estimate," section "PROCESSING CENTER—DATA STORAGE, Mail Lists" at Tr. 3/723-24.

a.   Please confirm that the number, 230.04, is expressed in units of "sessions/business day." If you do not confirm, please show the derivation of the correct units. Please explain why this same number is variously identified as "Customer sessions per business day" at Tr. 3/720, "Total Transactions Per Day" at Tr. 3/722, and "Total Documents Per Day" at Tr. 3/722.

b.   Please confirm that the number, 1,150, is expressed in units of "sessions/week." If you do not confirm, please show the derivation of the correct units. Please confirm that the formula for computing this number is (230.04 sessions/business day) * (5 business days/week). If you do not confirm, please provide the correct formula. Please confirm that when originally calculating the number 230.04 you assumed that there are 6 business days per week ("6 day work week assumed," Tr. 3/720). If you do not confirm, please explain. Please reconcile the 6-day week used at page 720 with the 5-day week used at page 723.

c.   Please confirm that the number, 59,810, is expressed in units of "sessions/year." If you do not confirm, please show the derivation of the correct units. Please confirm that in computing this number, you have assumed 260 business days per year. If you do not confirm, please explain. Please confirm that when originally calculating the number 230.04 you assumed that there are 312 business days per year ("Calculated (sessions per year / 312 business days in a year, . . .)" Tr. 3/720). Please confirm that "sessions/year" can be calculated directly from page 720 as (5981 users) * (12 sessions/user/year) = 71,772 sessions/year. See Tr. 4/858. If you do not confirm, please explain.

d.   Please confirm that the number, 4,120, is expressed in units of "pieces/session." If you do not confirm, please show the derivation of the correct units. Please explain why this same number is variously identified as "Number of Addresses Per Mailing List" at Tr. 3/720, "Average mailing pieces per document" at Tr. 3/721, and "Number of Addresses Per Mailing List" at Tr. 3/723.

e.   Please confirm that the number, 200, is expressed in units of "bytes/piece." If you do not confirm, please show the derivation of the correct units. Please state the file format for addresses—e.g., PDF, Postscript, other (specify). Is this format independent of whether the address is associated with a mail merge or non-mail merge job?

f.   Please confirm that the number, 823,901, is expressed in units of "bytes/session." If you do not confirm, please show the derivation of the correct units. Please state the file format for mailing lists—e.g., PDF, Postscript, other (specify). Is this format independent of whether the list is associated with a mail merge or non-mail merge job? What is current practice?

g.   Please confirm that the number, 30, is expressed in units of "days." If you do not confirm, please show the derivation of the correct units. Please explain why this number differs from the on-line storage duration (1 day) for financial transactions at Tr. 3/722. What is current practice?

h.   Please confirm that the number, 90, is expressed in units of "days." If you do not confirm, please show the derivation of the correct units. Please explain why this

number differs from the backup storage duration (180 days) for financial
transactions at Tr. 3/722. What is current practice?

i. Please confirm that the number, 120, is expressed in units of "days." If you do
not confirm, please show the derivation of the correct units. Please explain why
the duration for *archival* storage of addresses should be shorter than the
duration for both *backup* storage (180 days) and archival storage (1460 days) of
financial transactions at Tr. 3/722. What is current practice?

j. Please confirm that the number, 0.15, is a pure number with no units associated
with it. If you do not confirm, please show the derivation of the correct units.
What compression ratios are actually being obtained at present?

k. Please confirm that the number, 852,879,807.7, is expressed in units of "bytes."
If you do not confirm, please show the derivation of the correct units. Please
confirm that this storage requirement will be much smaller at the beginning of
1999 and much larger at the end of 1999 if volume grows during the year. If you
do not confirm, please explain.

l. Please confirm that the number, 2,558,639,423, is expressed in units of "bytes."
If you do not confirm, please show the derivation of the correct units. Please
confirm that this storage requirement will be much smaller at the beginning of
1999 and much larger at the end of 1999 if volume grows during the year. If you
do not confirm, please explain.

m. Please confirm that the number, 3,411,519,231, is expressed in units of "bytes."
If you do not confirm, please show the derivation of the correct units. Please
confirm that this storage requirement will be much smaller at the beginning of
1999 and much larger at the end of 1999 if volume grows during the year. If you
do not confirm, please explain.

RESPONSE

a. Confirmed that the figure 230.04 represents total user transactions per day. During
each user session a user is assumed to transact once with Mailing Online, i.e.
submit one document, a corresponding mailing list, and pay for the mailing. There is
therefore a one-to-one correspondence between the number of user sessions,
transactions, and documents.

b. Confirmed that the figure 1,150 represents the total number of transactions per
week as indicated in Attachment 1: "Total Transactions Per Week". Confirmed that
the formula for computing this number is (230.04 sessions/business day) * (5
business days/week). The 6-day week used at page 720 conflicts with the 5-day
week used at page 722 and can not be reconciled. The six day work week should
be used.

c. Confirmed that the figure 59,810 represents the total number of transactions per year as indicated in Attachment 1; "Total Transactions Per Year". Confirmed that when originally calculating the number 230.04 I assumed that there are 312 business days per year. Confirmed that "sessions/year" can be calculated directly from page 720 as (5981 users) * (12 sessions/user/year) = 71,772 sessions/year.

d. Confirmed that the figure 4,120 represents the number of addressees per mailing list as indicated in Attachment 1: "Number of bytes per address". Each mail piece is assumed to have one unique addressee. For any given mailing, there is a one-to-one correspondence between mail pieces and addressees. The total number of mail pieces and addresses in a mailing list the user submits for the same mailing are therefore the same.

e. Confirmed that the figure 200 represents the number of bytes per address as indicated in Attachment 1: "Number of bytes per address". Mailing Online accepts mailing lists in one of several formats, including Excel. For estimating purposes, each character of data represents one byte. There is no distinction between mail merge and non-mail-merge jobs with respect to the data format of mailing lists sent customers send to Mailing Online

f. Confirmed that the figure 823,901 represents the number of bytes per mailing list as indicated in Attachment 1: "Number of bytes Per mailing list". Mailing Online accepts mailing lists in one of several formats, including Excel. For estimating purposes, each character of data represents one byte. This format is independent of whether the job is a mail merge or non-mail-merge job. The current Mailing Online software formats the mailing list into a Microsoft Access Database.

g. Confirmed that the figure 30 represents the number of days transactions must be stored on-line as indicated in Attachment 1: "Transaction On-line Storage Duration Requirement (days). As elaborated in the "Source" column, there is no identified on-line storage requirement beyond what may be required to re-transmit a users job to a print site. Thirty days is assumed here and for "PDF File On-line Storage Duration Requirement" given that a retransmission or reconstruction of a user mailing would require both the source document and associated mailing list to be available. For

Financial transactions, on-line storage is required to satisfy the need to perform payment settlement daily, back up requirements stem from agreements made by the Postal Service and financial institutions, and archive requirements stem from agreements the Postal Service has made with credit card processors. There is no established requirement that mailing lists be retained for the same duration as financial transactions. Currently, Mailing Lists are available from a period of between 30 and 60 days

h. Confirmed that the figure 90 represents the number of days transactions must be retained as backup as indicated in Attachment 1: "Transaction Backup Duration Requirement (days). As elaborated in the "Source" column, there is no identified backup storage requirement. Ninety days is assumed here and for "PDF File Backup Duration Requirement" given that a retransmission or reconstruction of a user mailing would require both the source document and associated mailing list to be available. For Financial transactions, on-line storage is required to satisfy the need to perform payment settlement daily, back up requirements stem from agreements made by the Postal Service and financial institutions, and archive requirements stem from agreements the Postal Service has made with credit card processors. There is no established requirement that mailing lists be retained for the same duration as financial transactions. Currently, weekly backups of mailing lists are performed. No duration period has been established for mailing list data backups. Until a duration period is established, backup data is being stored for an indefinite period.

i. Confirmed that the figure 120 represents the number of days transactions must be archived as indicated in Attachment 1: "Transaction Archive Duration Requirement (days). As elaborated in the "Source" column, there is no identified on-line storage requirement beyond what may be required to re-transmit a users job to a print site. 120 days is assumed here and for "PDF File Archive Duration Requirement" given that a retransmission or reconstruction of a user mailing would require both the source document and associated mailing list to be available. For Financial transactions, on-line storage is required to satisfy the need to perform payment settlement daily, back up requirements stem from agreements made by the Postal

Service and financial institutions, and archive requirements stem from agreements the Postal Service has made with credit card processors. There is no established requirement that mailing lists be retained for the same duration as financial transactions. At present, no actual archiving of mailing data has been performed.

j. Confirmed. At present, Mailing Online back up data is not being compressed.

k. Confirmed that the figure 852,879,807.7 represents the total number of on-line data requirements in bytes as indicated in Attachment 1: "Transaction On-line Data requirement (bytes). Confirmed that the requirement will be smaller at the beginning of 1999 and will be larger at the end of 1999, but only if the number of Mailing Online users, or transactions differ from the estimates provided in Attachment 1.

l. Confirmed that the figure 2,558,639,423 represents the total number of backup data requirements in bytes as indicated in Attachment 1: "Transaction Backup Data requirement (bytes). Confirmed that the requirement will be smaller at the beginning of 1999 and will be larger at the end of 1999, but only if the number of Mailing Online users, or transactions, differ from the estimates provided in Attachment 1.

m. Confirmed that the figure 3,411,519,231 represents the total number of archive data requirements in bytes as indicated in Attachment 1: "Transaction Archive Data requirement (bytes)." Confirmed that the requirement will be smaller at the beginning of 1999 and will be larger at the end of 1999, but only if the number of Mailing Online users, or transactions differ from the estimates provided in Attachment 1.

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OCA/USPS-T3-51.   Please refer to the column "YR 1999 Estimate," section
"PROCESSING CENTER—APPLICATION SERVER, Backup Financial Transactions
(Night Only)" at Tr. 3/724.

a.   The number, 221, is sourced to "ATTACHMENT E." Please provide a copy of or
        citation to "ATTACHMENT E."

b.   The number, 30, is sourced as "Four hour estimated nightly maintenance
        period/8." Please explain the rationale for (1) choosing a four-hour period and
        (2) allocating one-eighth of that period to financial transactions backup.

RESPONSE

a. "Attachment E" should read "Attachment 3: Sources".

b.   For purposes of this estimate, a period of time when system maintenance can be
performed without impacting users is assumed. That period of time is further assumed
to be the hours of the night when user submission of jobs, batching of jobs, and
transmission of data to print sites would not take place, or least be unlikely to occur.
Based on this, this four hour time period is assumed to be between the hours of
09:00PM and 3:00AM Pacific Time. Given that multiple functions would have to be
performed during this time period, including four backup jobs (one each for Financial
Transactions, PDF Files, Postscript Files, and Mailing Lists) plus any other required
systems maintenance, it seems reasonable to allocate only one eighth of the four hour
period to the backup of financial transactions.

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OCA/USPS-T3-52. Please refer to USPS-LR-1/MC98-1, Attachment 1, at page 10, section "PROCESSING CENTER—APPLICATION SERVER, Backup PDF Files (Night Only)," in the column "YR 1999 Estimate."

a.   Please confirm that the figure, 230.04, is expressed in units of "sessions/business day." If you do not confirm, please show the derivation of the proper units.

b.   Please confirm that the figure, 320.78, is expressed in units of "(sessions/business day * (bytes/page (PDF)))/sec." Please confirm that the correct units should be "(bytes (PDF)/business day)/sec." If you do not confirm, please show the derivation of the proper units.

c.   Please confirm that the formula used to calculate the figure 320.78 should contain the multiplicative terms 3.2 pages per piece, 4,120 pieces per session, and 0.5 mail merge factor yielding 2,114,299.573 "(bytes (PDF)/business day)/sec." If you do not confirm, please explain.

RESPONSE

a. Confirmed that the figure 230.04 represents the total number of transactions (sessions) per day as indicated in Attachment 1: "Total Transactions Per Day".

b. Confirmed that the figure represents the number of bytes per second of PDF data that would need to backed up during the period designated for running the backup job at night during a four hour nightly maintenance period.

c. Confirmed that the formula used to calculate the figure 320.78 should contain the multiplicative term 3.2 pages per document. Not confirmed that the figure 320.78 should contain the multiplicative terms 4,120 pieces per session or 0.5 mail merge factor. The resulting figure when using the multiplicative factor 3.2 is 1026.48.

OCA/USPS-T3-53. Please refer to USPS-LR-1/MC98-1, Attachment 1, at page 10,
section "PROCESSING CENTER—APPLICATION SERVER, Backup Postscript Files
For Non-Mail Merge Jobs (Night Only)," in the "SOURCE" column. With respect to the
"Number of pages per Document," please provide, in hardcopy and electronic form, a
copy of or citation to the "Feasibility Study."

RESPONSE

The words "Feasibility Study" in Attachment 1, page 10, "Number of pages per

Document" in the "SOURCE column" should read "Library Reference USPS-LR-

2/MC98-1, Section E, Table 12.

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OCA/USPS-T3-54. Please refer to USPS-LR-1/MC98-1, Attachment 1, at page 10,
section "PROCESSING CENTER—APPLICATION SERVER, Backup Postscript Files
For Non-Mail Merge Jobs (Night Only)," in the column "YR 1999 Estimate."

a.   Please confirm that the figure, 3, is expressed in units of "pages/piece." If you
        do not confirm, please show the derivation of the proper units.

b.   Please confirm that the figure referred to in part (a) of this interrogatory should
        be 3.2 "pages/piece." If you do not confirm, please show the derivation of the
        number 3.

c.   Please confirm that the figure, 5888.98, is expressed in units of
        "((sessions/business day) * (bytes (Postscript)/pieces)))/sec." Please confirm
        that the correct units should be "(bytes (Postscript)/business day)/sec." If you do
        not confirm, please show the derivation of the proper units.

d.   Please confirm that the formula used to calculate the figure 5888.98 should
        contain the multiplicative terms 3.2 pages per piece, 4,120 pieces per session,
        and 0.5 mail merge factor yielding 12,938,502.56 "(bytes (Postscript)/business
        day)/sec." If you do not confirm, please explain.

RESPONSE

a. - d. The requirement for backup of Postscript files has been deleted. Refer to my

    response to OCA/USPS-T3-35(a) for details.

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OCA/USPS-T3-55. Please refer to USPS-LR-1/MC98-1, Attachment 1, at pages 10
and 11, section "PROCESSING CENTER—APPLICATION SERVER, Backup Mail
Lists," in the column "YR 1999 Estimate." Please confirm that the figure, 26323.45, is
expressed in units of "(bytes/business day)/sec." If you do not confirm, please show the
derivation of the proper units.

RESPONSE

Confirmed that the calculation for the figure is the number of transactions per day
(230.04) multiplied by number of bytes per mailing list (823,858), divided by the total
number of seconds within the back up period (7200 seconds).

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OCA/USPS-T3-56. Please refer to USPS-LR-1/MC98-1, Attachment 1, at pages 10 and 11.

a.   Please confirm that the "Bytes Per Second" for Backup Financial Transactions (Night Only), Backup PDF Files (Night Only), Backup Postscript Files for Non-Mail Merge Jobs (Night Only) and Backup Mail Lists, is 28.24, 320.78, 5888.98, and 26323.45, respectively. If you do not confirm, please explain.

b.   Please explain why the bytes per second referred to in part (a) of this interrogatory are not equal.

c.   Please confirm that the bytes per second referred to in part (a) of this interrogatory should be the same; that is, expressed in the same rate per second. If you do not confirm, please explain.

d.   Please confirm that the correct calculation for Backup Financial Transactions (Night Only), Backup PDF Files (Night Only), Backup Postscript Files for Non-Mail Merge Jobs (Night Only) and Backup Mail Lists, is the sum of the "(bytes/business day)" for Backup Financial Transactions (Night Only), Backup PDF Files (Night Only), Backup Postscript Files for Non-Mail Merge Jobs (Night Only) and Backup Mail Lists divided by the 14,400-second backup period. If you do not confirm, please explain.

RESPONSE

a. Confirmed, with exception of "bytes Per Second" for PDF Files, which should be 1026.48 as per my response to OCA/USPS-T3-52(c).

b.   Financial Transactions, PDF Files, and Mailing Lists each would be backed up as a separate process. As shown on pages 10 and 11, the number of transactions for Financial Transactions, PDF Files, and Mailing Lists are the same, but the size in bytes of each is different, therefore the total number of bytes for each is different and it therefore follows that the average numbers of bytes per second that must be backed up for any given period are different. The requirement for backup of Postscript files has been deleted. Refer to my response to OCA/USPS-T3-35(a) for more detail.

c. Not confirmed. Refer to part (b) above.

d. Not confirmed. The calculation for each file type is: Number of transactions per day multiplied by number of bytes per transaction, divided by the total number of seconds within the back up period.

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OCA/USPS-T3-57. Please refer to USPS-LR-1/MC98-1, Attachment 1, at page 11, section TECHNICAL HELP DESK RESOURCE YEARS, Help Desk Volumes/Durations, in the column YR 1999 Estimate.

a. Please confirm that the figure, 2,991, is expressed in units of "hours." If you do not confirm, please show the derivation of the proper units.

b. Please confirm that the figure, 1,794, is expressed in units of "hours." If you do not confirm, please show the derivation of the proper units.

c. Please confirm that the figure, 4,785, is expressed in units of "hours." If you do not confirm, please show the derivation of the proper units.

d. Please confirm that the figure, 2.66, is expressed in units of "resource year." If you do not confirm, please show the derivation of the correct units.

e. Please confirm that the figure, 0.5, is a pure number with no associated units. If you do not confirm, please show the derivation of the proper units.

f. Please confirm that the figure, 2,392, is expressed in units of "hours." If you do not confirm, please show the derivation of the proper units.

g. Please confirm that the figure, 1.33, is expressed in units of "resource years." If you do not confirm, please show the derivation of the correct units.

h. Please confirm that the figure referred to in part (f) of this interrogatory is not used in the calculation of the figure, 1.33, "resource years" or for any other purpose. If you do not confirm, please explain.

RESPONSE

a. Confirmed that the figure, 2,991, represents the total first time call hours as indicated in Attachment 1: "Total First Time Call Hours."

b. Confirmed that the figure, 1,794, represents the total number of hours representing on-going calls as indicated in Attachment 1: "Total On-going call hours.

c. Confirmed that the figure, 4,785, represents the total number of call hours as indicated in Attachment 1: "Total call hours".

d. Confirmed that the figure, 2.66, represents the number of help desk resource years as indicated in Attachment 1: "Total Help Desk Resource Years".

e. Confirmed that the figure, 0.5, is a pure number with no associated units. This figure represents the percentage of customer calls requiring technical help as indicated in Attachment 1: "Percentage of customer calls requiring technical help".

f.   Confirmed that the figure, 2,392, represents the total number of hours taken by

       customer calls requiring technical assistance as indicated in Attachment 1:

       "Technical Help Desk Calls"

g.   Confirmed that the figure, 1.33, represents the total of resources, expressed in

       resource years, required to support customer calls requiring technical support as

       indicated in Attachment 1: "Technical Help Desk resource Years"

h.   Confirmed that the figure referred to in part (f) of this interrogatory is not used in

       the calculation of the figure, 1.33, "resource years". The figure was included to

       show the number of hours attributable to customer calls requiring technical

       support.

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OCA/USPS-T3-58. Please refer to page 1 of your Cost Component Sources/ Derivations Worksheet, Tr. 3/733. The spreadsheet at the bottom of that page summarizes On-line Storage Requirements.

a. Please confirm that the entries in that spreadsheet for rows labeled "Item #8 PDF files" and "Item #11 Postscript files" are incorrect. (See OCA/USPS-T3-48(b), 49(d).) If you do not confirm, please explain.

b. Please confirm that when the entries in that spreadsheet for rows labeled "Item #8 PDF files" and "Item #11 Postscript files" are corrected, the Total On-line Storage Requirement exceeds capacity for all years except 1999. If you do not confirm, please explain.

RESPONSE

a. - b. Refer to my response to OCA/USPS-T3-35(a) regarding the deletion of the requirement to store Postscript files and my response to OCA/USPS-T3-48(b) confirming that the figures for on-line file storage in PDF format should contain the multiplicative term 3.2 pages per document. Shown below is the spreadsheet at the bottom of page 1 of Cost Component Derivations Worksheet, adjusted to eliminate the Postscript file storage requirement and adjusting the PDF file storage requirement.

On-line Storage Requirements	1999	2000	2001	2002	2003
Item # 5 Financial Transactions	24402.48	42591.12	66402.00	93085.20	108732.00
Item # 8 PDF files	16629020.31	29023632.00	45249507.69	63432720.00	74095200.00
Item #14 Mailing Lists	2.72922E+09	4.76322E+09	7.42644E+09	1.04107E+10	1.21607E+10
Total On-line Storage Requirement (Items # 4 + # 8 + # 14)	2.74587E+09	4.79228E+09	7.47176E+09	1.04742E+10	1.22349E+10
Attachment #2 (PC 1, PC 5) Capacity (Primary & Secondary)	3.36000E+11	3.39000E+11	3.39000E+11	3.39000E+11	3.39000E+11

Based on the above, I can not confirm that total on-line storage requirements will be exceeded in any of the years 1999 - 2003.

OCA/USPS-T3-59. Please refer to page 2 of your Cost Component Sources/
Derivations Worksheet, Tr. 3/734. The spreadsheet at the top of that page
summarizes Backup Data Storage Requirements.

a.   Please confirm that the entries in that spreadsheet for rows labeled "Item #9 PDF
        files" and "Item #12 Postscript files" are incorrect. (See OCA/USPS-T3-48(d),
        49(f).) If you do not confirm, please explain.
b.   Please confirm that when the entries in that spreadsheet for rows labeled "Item
        #9 PDF files" and "Item #12 Postscript files" are corrected, the Total On-line
        Storage Requirement exceeds capacity in 2003. If you do not confirm, please
        explain.

RESPONSE

a. - b. Refer to my response to OCA/USPS-T3-35(a) regarding the deletion of the
requirement to store Postscript files and my response to OCA/USPS-T3-48(d)
confirming that the figures for backup file storage in PDF format should contain the
multiplicative term 3.2 pages per document. Shown below is the spreadsheet at the
top of page 2 of Cost Component Derivations Worksheet, adjusted to eliminate the
Postscript file storage requirement and adjusting the PDF file storage requirement.

Backup Data Storage Requirements	1999	2000	2001	2002	2003
Item # 6 Financial Transactions	4392446.40	7666401.60	11952360.00	16755336.00	19571760.00
Item # 9 PDF files	49887060.92	87070896.00	135748523.08	190298160.00	222285600.00
Item # 15 Mailing Lists	8.18765E+09	1.42896E+10	2.22793E+10	3.12321E+10	3.64820E+10
Total Backup Data Storage Requirement (Items # 6 + # 9 + # 15)	8.24193E+09	1.43844E+10	2.24270E+10	3.14392E+10	3.67238E+10
Attachment #2 (PC2) Capacity (Primary & Secondary)	2.00000E+12	2.00000E+12	2.00000E+12	2.00000E+12	2.00000E+12

Based on the above, I can not confirm that total on-line storage requirement will be
exceeded in 1999 or any of the years 2000 - 2003.

OCA/USPS-T3-60.   Please refer to page 2 of your Cost Component Sources/
Derivations Worksheet, Tr. 3/734. The spreadsheet in the middle of that page
summarizes Archive Data Storage Requirements.

a.   Please confirm that the entries in that spreadsheet for rows labeled "Item #7
        Financial Transactions," "Item #10 PDF files," and "Item #13 Postscript files" are
        incorrect. (Compare Tr. 3/722, Item #7 with Tr. 3/734, Item #7; see OCA/USPS-
        T3-48(f), 49(h).) If you do not confirm, please explain.

b.   Please confirm that when the entries in that spreadsheet for rows labeled "Item
        #7 Financial Transactions," "Item #10 PDF files," and "Item #13 Postscript files"
        are corrected, the Total On-line Storage Requirement exceeds capacity in all
        years except 1999 and 2000. If you do not confirm, please explain.

RESPONSE

a. - b. Refer to my response to OCA/USPS-T3-35(a) regarding the deletion of the

        requirement to store Postscript files and my response to OCA/USPS-T3-48(f)

        confirming that the figures for archive file storage in PDF format should contain the

        multiplicative term 3.2 pages per document. Shown below is the spreadsheet at the

        middle of page 2 of Cost Component Derivations Worksheet, adjusted to eliminate

        the Postscript file storage requirement and adjusting the PDF file storage

        requirement.

Archive Data Storage Requirements	1999	2000	2001	2002	2003
Item # 7 Financial Transactions	1150.19	2007.50	3129.81	4387.50	5125.00
Item # 10 PDF files	66516081.23	116094528.00	180998030.77	253730880.00	296380800.00
Item # 16 Mailing Lists	10916861538.46	19052861538.46	29705760000.00	41642806153.85	48642609230.77
Total Archive Data Storage Requirement (Items # 7 + # 10 + # 16)	1.09834E+10	1.91690E+10	2.98868E+10	4.18965E+10	4.89390E+10
FTK 9710 Storage Capacity (Primary and Secondary)	2.00000E+12	2.00000E+12	2.00000E+12	2.00000E+12	2.00000E+12

        Based on the above, I can not confirm that total on-line storage requirement will be

        exceeded in any of the years 1999 - 2003.

DECLARATION

I, Daniel Stirewalt, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

_____

Dated: ___10/15/98___

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all

participants of record in this proceeding in accordance with section 12 of the Rules of

Practice.

Scott L. Reiter

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260–1137
October 15, 1998